

REMARKS

Claim 3 has been rewritten in independent form to include all of the limitation of the base claim 1 and is otherwise the same claim as the originally filed claim 3.

Claim 21 has been rewritten in independent form to include all of the limitation of the base claim 20 and is otherwise the same claim as the originally filed claim 21.

The Examiners comments concerning the specification with respect to boldfacing and underlining the section headings pertain to optional requirements and Applicants have elected not to amend the specification with respect to boldfacing and underlining.

The Examiners comments concerning arrangement of the specification pertain to optional requirements and Applicants have elected not to amend the specification with respect to arrangement of the specification.

Applicants have amended the paragraph beginning on page 7, line 8 to correct typographical errors.

The Examiner rejected claims 1, 4-10, 12-16, 18-26, and 28-31 under 35 U.S.C. §102(b) as allegedly being anticipated by MacPherson (U.S. patent No. 4,972,175).

The Examiner rejected claim 2 under 35 U.S.C. §103(a) as allegedly being unpatentable over MacPherson (U.S. patent No. 4,972,175) in view of Fischer (U.S. patent No. 5,136,643).

The Examiner rejected claims 3, 11, 17, and 27 under 35 U.S.C. §103(a) as allegedly being unpatentable over MacPherson (U.S. patent No. 4,972,175) in view of Burton (U.S. patent No. 4,972,175).

Applicants respectfully traverse the §102(b) and §103(a) rejections.

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35 U.S.C. §102(b)

The Examiner rejected claims 1, 4-10, 12-16, 18-26, and 28-31 under 35 U.S.C. §102(b) as allegedly being anticipated by MacPherson (U.S. patent No. 4,972,175).

Applicants respectfully contend that MacPherson does not anticipate claims 1, 14, 20, and 31 because MacPherson does not teach each and every feature of claims 1, 14, 20, and 31. For example, MacPherson does not teach the feature: "wherein the tamper respondent wrap comprises a plurality of layers, and wherein each layer of the wrap includes a plurality of electrically conductive lines or a plurality of electrically conductive ink traces". Applicants note that MacPherson's security enclosure includes alternating insulating layers 16 and layers of semiconductor fibers 17. See MacPherson, col. 4, lines 53-58 and Fig. 5b. Therefore, claims 1, 14, 20, and 31 do not read on MacPherson.

Based on the preceding arguments, Applicants respectfully maintain that MacPherson does not anticipate claims 1, 14, 20, and 31, and that claims 1, 14, 20, and 31 are in condition for allowance. Since claims 2 and 4-13 depend from claim 1, Applicants contend that claims 2 and 4-13 are likewise in condition for allowance. Since claims 15-19 depend from claim 14, Applicants contend that claims 15-19 are likewise in condition for allowance. Since claims 22-26 depend from claim 20, Applicants contend that claims 22-26 are likewise in condition for allowance.

In addition, Applicants respectfully contend that MacPherson does not anticipate claims 13, 19, and 21, because MacPherson does not teach each the following feature of claims 13, 19, and 21: "wherein the extension cable comprises a **flexible dielectric material**" (emphasis added).

The Examiner argues: "MacPherson teaches wherein the extension cable comprises a flexible dielectric material (see column 6, lines 39-43)".

In response, Applicants respectfully note that in col. 6, lines 39-43, MacPherson states: "Termination to the security enclosure can be achieved by a number of means; one example of a connection strip being shown in FIGS. 8 and 9. A strip of this insulating film 19 coated with insulating adhesive is cut in the shape shown." Applicants maintain that the preceding quote from MacPherson does not disclose that the material of the cable is flexible, as required by claims 13, 19, and 21. Accordingly, Applicants maintain that claims 13, 19, and 21 do not read on MacPherson.

35 U.S.C. §103(a)

The Examiner rejected claim 2 under 35 U.S.C. §103(a) as allegedly being unpatentable over MachPherson (U.S. patent No. 4,972,175) in view of Fischer (U.S. patent No. 5,136,643). Since claim 2 depends from claim 1, which Applicants have argued *supra* to be patentable under 35 U.S.C. §102(b), Applicants maintain that claim 2 is not unpatentable under 35 U.S.C. §103(a).

The Examiner rejected claims 3, 11, 17, and 27 under 35 U.S.C. §103(a) as allegedly being unpatentable over MacPherson (U.S. patent No. 4,972,175) in view of Burton (U.S. patent No. 4,972,175). Since claims 11 and 27 have been canceled, Applicants maintain that the rejection of claims 11 and 27 is moot.

As to claims 3 and 17, Applicants respectfully contend that claims 3 and 17 are not unpatentable over MacPherson in view of Burton, because MacPherson in view of Burton does not teach or suggest the following feature of claims 3 and 17: "wherein the tamper respondent wrap includes an adhesive inner surface that adheres the wrap to the electronic assembly".

The Examiner argues: "Burton teaches a planar intelligent battery label for the exterior surface of a standard battery pack (see abstract), in which he teaches wherein the tamper respondent wrap includes an adhesive inner surface that adheres the wrap to the electronic assembly (see column 10, lines 1-14).... Therefore, it would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified MacPherson to include wherein the tamper respondent wrap includes an adhesive inner surface that adheres the wrap to the electronic assembly.... It would have been obvious to a person having ordinary

skill in the art at the time the invention was made to have modified MacPherson, by the teachings of Burton because wherein the tamper respondent wrap includes an adhesive inner surface that adheres the wrap to the electronic assembly would provide a way to attach the base to the device (see Burton, column 10, lines 1-2)."

In response to the preceding argument by the Examiner, Applicants respectfully contend that the Examiner's argument for modifying MacPherson with the teaching of Burton is not persuasive. Applicants note that Burton requires attachment of the base substrate of the battery label to the exterior surface of the battery pack, because the battery label is intended to be securely wrapped around **only a portion of an exterior surface of the battery pack** (see Burton, col. 3, lines 41-44), so that the use of adhesive effectuates a secure coupling between the battery label and the battery pack. In contrast, MacPherson's "security enclosure **completely encapsulates the item being protected**" (emphasis added) (see Macpherson, col. 1, lines 13-17), so that use of an adhesive is not needed in MacPherson to effectuates a secure coupling between the security enclosure and the item being protected. Thus, use of an adhesive in MacPherson is unnecessary and adds unnecessary processing steps. In addition, use of an adhesive in MacPherson would make it more difficult to decouple the security enclosure from the item being protected. Accordingly, Applicants respectfully contend that it is not obvious to modify MacPherson with the teaching of Burton.

Based on the preceding arguments, Applicants respectfully maintain that claims 3 and 17 are not unpatentable over MacPherson in view of Burton MacPherson, and that claims 3 and 17 are in condition for allowance.

CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and credit Deposit Account 09-0457.

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Jack P. Friedman
Jack P. Friedman
Registration No. 44,688

Schmeiser, Olsen & Watts
3 Lear Jet Lane, Suite 201
Latham, New York 12110
(518) 220-1850

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